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March 21, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Vera M. Scanlon, U.S.M.J.
225 Cadman Plaza East, Room 1214 South
Brooklyn, NY 11201-1804

Re: Taveras v. Value Service & Repair Corp., et al.
Case No.: 22-cv-03416 (HG)(VMS)

Dear Judge Scanlon:

I represent the Defendants in the above-referenced matter and write jointly with the Plaintiff.

The parties respectfully request an adjournment of the March 21, 2023 deadline to submit the proposed case management plan and the March 28, 2023 initial conference. Defendants also request an extension of time to file a response to the Complaint and Plaintiff consents to this request. The reason for these requests is that the parties previously attended a mediation session with an EDNY mediator and, on February 10, 2023 the parties submitted a proposed protective order to the Court related to financial records the parties agreed Defendants will produce prior to the next mediation session. [ECF Doc. No. 28]. The parties request that the deadlines be held in abeyance and if the parties are unable to resolve this case, they will inform the Court at which time these deadlines can be reset. The parties also respectfully request that the Court so order the protective order.

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/s/ Jamie S. Felsen